

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

IN RE:)	CHAPTER 11
)	
Crate Holdings LLC d/b/a Crate Holdings)	Case No.: 24-00312-eg
Ammo,)	
)	
<u>Debtor.</u>)	

**DEBTOR'S RESPONSE TO RULE TO SHOW CAUSE AND REQUEST FOR
DISMISSAL OF CHAPTER 11 CASE**

Crate Holdings LLC d/b/a Crate Holdings Ammo (the "Debtor") submits this Response to the Rule to Show Cause As To Why Case Should Not Be Dismissed or Converted. Due to an unanticipated and significant drop in sales which prevented the Debtor from meeting its regular operating expenses and prevented the Debtor from making its Plan payments, the Debtor has now closed its business operations. The Debtor does not believe that there are any unencumbered assets that could be liquidated to pay unsecured creditors, and therefore no purpose would be served by conversion to chapter 7. **Therefore, the Debtor requests that the case be dismissed.**

The administrative expenses in this case have not been paid in full. The Subchapter V Trustee was awarded \$4,170.00, and is still owed \$170 of that amount. Counsel for the Debtor was awarded \$40,304.67 in fees and expenses through confirmation of the Plan, and has been paid only \$17,500.00 of this amount. Counsel's remaining approved fees of \$22,804.67 plus additional fees and costs that have accrued post-petition in the amount of \$10,783.84 remain unpaid. Debtor's counsel has not received an installment payment on her fees since October, 2024. Conversion of the case would result in further time expended by Debtor's counsel for which there would be no compensation.

WHEREFORE, the Debtor requests that the case be dismissed without the need for a hearing, and for such further relief as the Court deems appropriate.

BARTON BRIMM, PA
By: /s/ Christine E. Brimm
Christine E. Brimm, #6313
P.O. Box 14805
Myrtle Beach, SC 29587
(803) 256-6582
cbrimm@bartonbrimm.com
Attorney for Debtor